

## REMARKS

Applicant requests reconsideration and allowance of the subject patent application in light of the changes above and the remarks that follow. Claims 16, 18-21, 23-26 and 28 have been amended. Claims 17 and 22 have been cancelled by this Amendment. Claims 16, 18-21, and 23-31 are currently pending.

In the Office Action dated March 29, 2010, claims 16-31 were rejected under § 103(a) on the basis of U.S. Publication No. 2002/0069361 to Watanabe et al. (hereinafter "Watanabe") in view of U.S. Publication No. 2001/0036301 to Yamaguchi et al. (hereinafter "Yamaguchi"). The rejection is traversed as follows.

For clarification, claim 16 has been amended to recite a method of securing access to a piece of equipment, the method comprising:

- obtaining a reference datum for an authorized user, wherein said reference datum comprises at least an authentic biometric signature;

- storing an encrypted version of said authentic biometric signature on said piece of equipment;

- acquiring, at a sensor, a plain biometric signature for a user requesting access to said piece of equipment;

- transmitting, from said piece of equipment, said encrypted biometric signature to an authentication medium comprising an electronic chip card that is separate from said piece of equipment;

- decrypting, in said authentication medium, said encrypted authentic biometric signature received from said piece of equipment;

- verifying, in said authentication medium, the authenticity of said plain biometric signature by comparing said plain biometric signature of said user with said decrypted authentic biometric signature of an authorized user; and

- granting said user access to said piece of equipment if said comparison is successful and denying access if said comparison fails. (emphasis added)

As previously submitted in the Amendment dated January 25, 2010, in the context of the present invention, the biometric signature, e.g. finger print, that is

required for access to a piece of equipment, e.g. a computer, is stored on that piece of equipment. By means of such an arrangement, a single authentication medium, e.g. smart card, can be used to authorize access to a variety of different pieces of equipment, without having to store the biometric signatures for all of those pieces of equipment. As shown above, claim 16 has been amended, for clarification, to recite that "the authentication medium is an electronic chip card."

In the Advisory Action dated July 26, 2010, the Examiner asserts that Figs. 24 and 27 of Watanabe disclose all feature of claim 16, except that the reference does not disclose a single embodiment containing all of the steps in claim 16. Further, Yamaguchi is cited in the Advisory Action as allegedly showing that it would have been obvious to try the combination of the steps in claim 16. Applicant respectfully disagrees.

Referring to Fig. 24 of Watanabe, the IDC is stored in the UD, and a comparison between the sampling information and the IDC is performed by the UD to determine if access to the UD is granted.

Referring to Fig. 27 of Watanabe, the IDC allegedly is stored in a personal terminal such as an IC card, and a comparison between the sampling information and the IDC is performed by the personal terminal.

In Fig. 24 of Watanabe, the IDC is stored in the UD because the system illustrated in the figure does not include an IC card. When an IC card is included in a system, as illustrated in Fig. 27 of Watanabe, the reference discloses that the IDC is stored in the IC card. As such, Fig. 27 of Watanabe teaches away from storing the IDC in the UD when the system includes an IC card.

Figs. 24 and 27 of Watanabe, even if considered in combination with the Yamaguchi reference, do not disclose that the encrypted biometric signature is stored in the device to which the user requests access, and then transferred to an authentication medium that is separate from such device for comparison with a signature acquired by a sensor. Even assuming that the Examiner is correct to assert that Yamaguchi discloses storing an encrypted biometric signature on a computer, the Yamaguchi reference does not disclose that such computer is the device to which the user requests access. Accordingly, Watanabe and Yamaguchi, even considered in combination, at most disclose storing an IDC in a server computer, and transferring the IDC to the IC card to compare with the sampling information. Watanabe and Yamaguchi do not disclose storing the encrypted biometric signature in the device to which the user requests access, and transferring the information stored in the device to an authentication medium that is separate from such device for comparison with a signature acquired by a sensor, as described in claim 16.

In the Advisory Action, the Examiner refers to Fig. 28 of Watanabe in the Advisory Action, and asserts that the service provider (SP) in Watanabe can be considered as corresponding to the claimed authentication medium.

In the present specification, it is disclosed that an authentication medium CRD is in the form of an electronic chip card. For clarification, claim 16 has been amended to recite that "the authentication medium is an electronic chip card."

In contrast, Fig. 28 of Watanabe illustrates that the sampling information is compared with the IDC in the service provider (SP), which is not an electronic chip card. Accordingly, Watanabe, even if considered in combination with Yamaguchi,

does not disclose storing the encrypted biometric signature in the device to which the user requests access, and transferring the encrypted biometric signature from the device to an electronic chip card that is separate from such device for comparison with a signature acquired by a sensor, as described in claim 16.

In rejecting claims 17 and 22, the Examiner asserts that Watanabe discloses that the authentication medium is an IC card. Applicant respectfully disagrees.

Watanabe discloses several instances in Figs. 25-27 in which an IC card is included in the system. Referring to Figs. 25 and 26 of Watanabe, the IDC is stored in a personal terminal such as an IC card, and a comparison between the sampling information and the IDC is performed by the UD to determine if access to the UD is granted. As mentioned above, in Fig. 27 of Watanabe, the IDC is stored in a personal terminal such as an IC card, and a comparison between the sampling information and the IDC is performed by the personal terminal.

In Watanabe, none of the instances in which an IC card is included in the system discloses storing the IDC in the UD, and transferring the IDC from the UD to the IC card for comparison with a signature acquired by a sensor.

Even assuming that the Examiner is correct to assert that Yamaguchi discloses storing an encrypted biometric signature on a computer, the Yamaguchi reference does not disclose that such computer is the device to which the user requests access.

Therefore, Watanabe and Yamaguchi, even considered in combination, do not disclose storing the encrypted biometric signature in the device to which the user requests access, and transferring the encrypted biometric signature from the device

to an electronic chip card that is separate from such device for comparison with a signature acquired by a sensor, as described in claim 16.

In view of the foregoing, it is respectfully submitted that the Watanabe and Yamaguchi references, whether considered individually or in combination, do not suggest the subject matter of claim 16. For similar reasons, it is respectfully submitted that the references do not suggest the subject matter of independent claims 21 or 26, or any of the claims depending therefrom.

### CONCLUSION

For the reasons set forth above, Applicant respectfully requests allowance of claims 16-31.

In the event that there are any questions concerning this paper, or the application in general, the Examiner is respectfully urged to telephone Applicant's undersigned representative so that prosecution of the application may be expedited.

If additional fees are required for any reason, please charge Deposit Account No. 02-4800 the necessary amount.

Respectfully submitted,

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